

**VIA FACSIMILE 703-872-9306****9D-EC-19348  
PATENT****Remarks**

The Office Action mailed April 28, 2004 has been carefully reviewed and the following remarks are made in consequence thereof.

Claims 1-75 and 79-81 are now pending in this application. Claims 1-78 stand rejected. Claims 1, 16, 19, 40, 45, 46, 55, 59, 63, 64, 68, 73 and 74 have been amended. Claims 79-81 have been newly added. Claims 76-78 have been canceled without prejudice, waiver, or disclaimer. No new matter has been added. No fees are due for the newly added Claims 79-81.

The rejection of Claims 1-78 under 35 U.S.C. § 103(a) as being unpatentable over Storch et al. (U.S. Patent No. 5,920,846) in view of "GE Answer Center" that includes articles "GEA: Making Things Happen-Consumer Friendly", referred to herein as reference A, "Connected to Consumers", referred to herein as reference B, "Benefiting from the 'Net'", referred to herein as reference C, and "'GE Answers Call to Evolve 10-Year-Old Help Line'", referred to herein as reference D, is respectfully traversed.

Storch et al. describe a Work Force Administration/Dispatch Out (WFA/DO) computer data processing system (270) that continuously inputs information into a computer memory of Due Date Availability System (DUDAS 266) for each service order that the WFA/DO receives, indicating the amount of time required to work and complete each service order for each day (column 55, lines 39-45). The DUDAS calculates and data processes this information to maintain up-to-date records indicating the availability of qualified outside technicians to work any new requests for installation of nondesigned services on a particular date or time (column 55, lines 45-50). If a qualified technician is available for service installation for a particular date and/or time, the DUDAS transmits a message to a Service Order Processor (SOP 268) indicating the technician is available and the time is open (column 55, lines 50-53). If a technician is not available for a date

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and/or time, the DUDAS inputs a message to the SOP indicating that the specific date or time is not available (i.e., closed for appointments) (column 55, lines 53-56).

Reference A describes the GE Answer Center that expected one million calls per year when it opened its doors 10 years ago with 25 customer service representatives (Abstract). Today, the center's 225 reps field approximately 3.6 million calls annually (Abstract). In an initiative to grow its out-of-warranty service business, GE Consumer Service is launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign (Abstract). The Answer Center also operates as a profit center by increasing brand commitment, reducing a number of in-warranty service calls, and increasing out-of-warranty calls (page 2, section 2). In-warranty calls are reduced when reps are able to troubleshoot problems with new appliances. These efforts, and the ability to refer out-of-warranty calls to authorized GE service technicians, also increase brand loyalty (page 2, section 3). According to Heywood, GE Consumer Service has always been an in-warranty and out-of-warranty service (page 5, section 1).

Reference B describes that GE Consumer Service encompasses a corp of 1,500 service technicians who do in-home repair of major appliances, both in-warranty and out-of warranty (page 1).

Reference C describes a 16-year-old, Louisville KY-based consumer-product-oriented General Electric Co (GE) Answer Center operates 24 hours a day to field people's questions about their appliances (Abstract). Roughly 45% of the inquiries it now receives arrive via the Web, helping call centers gain a competitive edge (Abstract).

Reference D describes a General Electric Co (GE) Answer Center (Louisville, Kentucky) that eliminates the frustrating customer service runaround by offering one-call customer service (Abstract). Behind the effectiveness of the GE Answer Center is a text database containing more than one million problem-resolution responses (Abstract). Any of these can be called up in less than 2 seconds (Abstract). The system also contains continually updated files of product, dealer, service, parts, and merchandising

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information (Abstract). If a fix requires a trained service technician, a caller is switched directly to a GE Service Center, where he can schedule an appointment if he desires (page 2, section 1).

References A, B, C, and D describe GE Answer Center and therefore, as used herein, GE Answer Center refers collectively to references A, B, C, and D.

Claims 2-18 and 73 depend from independent Claim 1 which recites a method of enabling scheduling of a service call in a computing environment, the method including "obtaining product information regarding a product from a user of the computing environment; automatically providing to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being; determining, by a first computing unit including a web browser, whether the product is serviced by a manufacturer of the product; and determining, by the first computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer."

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a method of enabling scheduling of a service call as recited in Claim 1. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by a first computing unit including a web browser, whether the product is serviced by a manufacturer of the product, and determining, by the first computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A

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describes launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of-warranty, reference C describes receiving inquiries via the Web, and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by a first computing unit including a web browser, whether the product is serviced by a manufacturer, and determining, by the first computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, performed by a computing unit including a web browser, as recited twice in Claim 1. For the reasons set forth above, Claim 1 is submitted to be patentable over Storch et al. in view of GE Answer Center.

Applicants respectfully traverse the statement on page 4 of the Office Action that GE Answer Center discloses "determining whether the product is serviced by a manufacturer of the product (See reference A, page 1, section 1, and page 2, section 3, wherein a determination is made whether the product is in warranty and serviced by the manufacturer); and determining whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer (See reference A, page 1, section 1, page 2, section 3, page 4, sections 3 and 4, and page 5, section 1, wherein out-of-warranty calls are referred to authorized service technicians)." Applicants respectfully submit that "the ability to refer out-of-warranty calls to authorized GE service technicians" in GE Answer Center, reference A, page 2, section 3, does not describe or suggest determining whether the

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product is serviced by a service provider if the product is not serviced by the manufacturer as recited in Claim 1. As stated on page 13, lines 10-20, of the specification, "Authorized service providers may comprise two different types of authorized service providers. For example, one type of authorized service provider may include authorized service providers who are under an agreement or contract with the appliance manufacturer...Such an agreement may include coverage under warranty...The other type of authorized service provider may not be under an agreement or contract with the manufacturer...". Thus, authorized service providers may provide coverage under warranty. Accordingly, "the ability to refer out-of-warranty calls to authorized GE service technicians" in GE Answer Center, reference A, page 2, section 3, does not describe or suggest determining whether the product is serviced by a service provider if the product is not serviced by the manufacturer as recited in Claim 1. For the reasons set forth above, Claim 1 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 2-18 and 73 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-18 and 73 likewise are patentable over Storch et al. in view of GE Answer Center.

Claims 20-27 and 74 depend, directly or indirectly, from independent Claim 19 which recites a method of enabling scheduling of a service call for repair of a home appliance in a computing environment, the method including "obtaining product information regarding a product at a first computing unit from input of the product information by a user at a second computing unit coupled to the first computing unit via a communications network; automatically providing from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being; determining, by a second computing unit including a web browser, whether the product is serviced by a manufacturer of the product; and determining, by the

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second computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer.”

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a method of enabling scheduling of a service call as recited in Claim 19. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by a second computing unit including a web browser, whether the product is serviced by a manufacturer of the product, and determining, by the second computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A describes launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of warranty, reference C describes receiving inquiries via the Web, and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by a second computing unit including a web browser, whether the product is serviced by a manufacturer, and determining, by the second computing unit, whether the product is serviced by a service provider if the product is not serviced by the manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining,

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performed by a computing unit including a web browser, as recited twice in Claim 19. For the reasons set forth above, Claim 19 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 20-27 and 74 are considered in combination with the recitations of Claim 19, Applicants submit that dependent Claims 20-27 and 74 likewise are patentable over Storch et al. in view of GE Answer Center.

Claims 29-45 and 75 depend, directly or indirectly, from independent Claim 28 which recites a system for enabling scheduling of a service call in a computing environment, the system including "at least one processor adapted to obtain product information regarding a product from a user of the computing environment; and said at least one processor adapted to: provide to the user, from whom the product information is obtained, at least one available appointment for scheduling a service call based on the product information; determine whether the product is serviced by a manufacturer of the product; and determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer".

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a system for enabling scheduling of a service call as recited in Claim 28. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest at least one processor adapted to determine whether the product is serviced by a manufacturer of the product, and determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A describes launching a nationwide program offering same-day or next-day

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service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of warranty, reference C describes receiving inquiries via the Web, and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest at least one processor adapted to determine whether the product is serviced by a manufacturer, and determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest at least one processor adapted to make the determinations recited in Claim 28. For the reasons set forth above, Claim 28 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 29-45 and 75 are considered in combination with the recitations of Claim 28, Applicants submit that dependent Claims 29-45 and 75 likewise are patentable over Storch et al. in view of GE Answer Center.

Claim 76 has been canceled. Claims 47-54 depend from independent Claim 46 which recites a system for enabling scheduling of a service call for repair of a home appliance in a computing environment, said system comprising: means for obtaining product information regarding a product at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network, wherein said first computing unit includes a web browser, configured to determine whether the product is serviced by a manufacturer of the product, and configured to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer; and means for providing from the first computing unit



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to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information, wherein the means for providing provides without interaction between the user and any other human being."

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a system for enabling scheduling of a service call as recited in Claim 46. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest the first computing unit includes a web browser, configured to determine whether the product is serviced by a manufacturer of the product, and configured to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A describes launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of warranty, reference C describes receiving inquiries via the Web, and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest the first computing unit that includes a web browser, configured to determine whether the product is serviced by a manufacturer, and configured to determine whether the product is serviced by a service provider if the product is not serviced by the

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manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a computing unit including a web browser and configured to make the determinations recited in Claim 28. For the reasons set forth above, Claim 46 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 47-54 are considered in combination with the recitations of Claim 46, Applicants submit that dependent Claims 47-54 likewise are patentable over Storch et al. in view of GE Answer Center.

Claim 77 has been canceled. Claims 56-63 depend from independent Claim 55 which recites at least one program storage device readable by a machine, tangibly embodying at least one program of instructions executable by the machine to perform a method of enabling scheduling a service call, the method including "obtaining product information regarding a product from a user; automatically providing to the user, from whom the product information is obtained, a plurality of available appointments for scheduling a service call based on the product information, wherein automatically providing includes providing without interaction between the user and any other human being; determining, by the machine, whether the product is serviced by a manufacturer of the product; and determining, by the machine, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer."

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest a method of enabling scheduling a service call as recited in Claim 55. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by the machine, whether the product is serviced by a manufacturer of the product, and determining, by the machine, whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service

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provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A describes launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of warranty, reference C describes receiving inquiries via the Web, and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, by the machine, whether the product is serviced by a manufacturer, and determining, by the machine, whether the product is serviced by a service provider if the product is not serviced by the manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest determining, performed by the machine, as recited twice in Claim 55. For the reasons set forth above, Claim 55 is submitted to be patentable over Storch et al. in view of GE Answer Center. For the reasons set forth above, Claim 55 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 56-63 are considered in combination with the recitations of Claim 55, Applicants submit that dependent Claims 56-63 likewise is patentable over Storch et al. in view of GE Answer Center.

Claim 78 has been canceled. Claims 65-72 depend from independent Claim 64 which recites an article of manufacture including "at least one computer usable medium having computer readable program code means embodied therein for causing a scheduling of a service call for repair of a home appliance, the computer readable program code means in said article of manufacture comprising: computer readable

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program code means for causing a computer to obtain product information regarding a product at a first computing unit from input of the product information by the user at a second computing unit coupled to the first computing unit via a communications network; computer readable program code means for causing a computer to provide from the first computing unit to the user that input the product information at the second computing unit at least one available appointment for scheduling a service call based on the product information; computer readable program code means for causing a computer to determine whether the product is serviced by a manufacturer of the product; and computer readable program code means for causing a computer to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, wherein the service provider is different than the manufacturer”.

None of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest an article of manufacture as recited in Claim 64. Specifically, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest computer readable program code means for causing a computer to determine whether the product is serviced by a manufacturer of the product, and computer readable program code means for causing a computer to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer, where the service provider is different than the manufacturer. Rather, Storch et al. describe transmitting a message to a Service Order Processor indicating a technician is available and a time is open if a qualified technician is available for service installation for a particular date and/or time. Reference A describes launching a nationwide program offering same-day or next-day service through Yellow Pages advertising campaign to grow an out-of-warranty service business, reducing the number of in-warranty service calls, and increasing out-of-warranty calls, referring out-of-warranty calls to authorized GE service technicians. Reference B describes performing in-home repair of major appliances, both in-warranty and out-of warranty, reference C describes receiving inquiries via the Web,

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and reference D describes switching a caller directly to the GE Service Center if a fix requires a trained service technician. Accordingly, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest computer readable program code means for causing a computer to determine whether the product is serviced by a manufacturer, and computer readable program code means for causing a computer to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer. Hence, none of Storch et al., reference A, reference B, reference C, or reference D, considered alone or in combination, describe or suggest computer readable program code means for causing a computer to make the determinations recited in Claim 64. For the reasons set forth above, Claim 64 is submitted to be patentable over Storch et al. in view of GE Answer Center.

When the recitations of Claims 65-72 are considered in combination with the recitations of Claim 64, Applicants submit that dependent Claims 65-72 likewise is patentable over Storch et al. in view of GE Answer Center.

With respect to independent Claims 19, 28, 46, 55 and 64, Applicants respectfully traverse the statement on page 20 of the Office Action that at least reference A of GE Answer Center teaches the limitations added in the amendments of 1/13/04 and that at least reference A teaches these limitations on page 1, section 1, page 2, section 3, page 4, sections 3 and 4, and page 5, section 1, wherein in-warranty calls are dealt with by the manufacturer and out-of-warranty calls are referred to authorized service technicians. Applicants respectfully submit that "the ability to refer out-of-warranty calls to authorized GE service technicians" in GE Answer Center, reference A, page 2, section 3, does not describe or suggest the limitations that were added in the amendments of 1/13/04. For example, "the ability to refer out-of-warranty calls to authorized GE service technicians" in GE Answer Center, reference A, page 2, section 3, does not describe or suggest a limitation "at least one processor adapted to determine whether the product is serviced by a service provider if the product is not serviced by the manufacturer" recited

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in Claim 28. As stated on page 13, lines 10-20, of the specification, "Authorized service providers may comprise two different types of authorized service providers. For example, one type of authorized service provider may include authorized service providers who are under an agreement or contract with the appliance manufacturer...Such an agreement may include coverage under warranty...The other type of authorized service provider may not be under an agreement or contract with the manufacturer...". Thus, authorized service providers may provide coverage under warranty. Accordingly, "the ability to refer out-of-warranty calls to authorized GE service technicians" in GE Answer Center, reference A, page 2, section 3, does not describe or suggest the limitations that were added in the amendments of 1/13/04. For the reasons set forth above, Claims 19, 28, 46, 55 and 64 are submitted to be patentable over Storch et al. in view of GE Answer Center.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-78 be withdrawn.

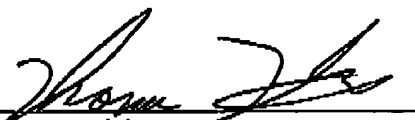
Newly added Claims 79-81 depend from independent Claim 1, which is submitted to be in condition for allowance and patentable over the cited art. For at least the reasons set forth above, Applicants respectfully submit that Claims 79-81 are also patentable over the cited art.

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In view of the foregoing remarks, this application is believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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